

T/S

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2019 FEB 27 PM 4:16

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
RIVERSIDE

SUSAN NASSAR  
11090 SEVEN PINES DR  
ALTA LOMA CA 91737  
Tel No. 626.221.8307  
Email address: rnassarins@gmail.com  
Fax: 909.963.5100

PLAINTIFF, IN PRO PER

BY

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SUSAN NASSAR

Plaintiff,

v.

BANK OF AMERICA, N.A.

Defendant.

Case No. **EDCV 19-00375 GW**

COMPLAINT

(Unlawful Debt Collection Practices)

(SPx)

SUSAN NASSAR ("Plaintiff") alleges the following against BANK OF AMERICA ("Defendant"):

**INTRODUCTION**

1. Count I of Plaintiff's Complaint is based on the Rosenthal Fair Debt Collection Practices Act ("Rosenthal"), Cal. Civ. Code §1788 et seq.

(1)

FREE PAID

S/20

- 1 2. Count II of the Plaintiff's Complaint is based on Telephone Consumer  
2 Protection Act ("TCPA"), 28 U.S.C. §227 et seq.

3  
4 **VENUE**

- 5 3. Jurisdiction of this court over Count II of Plaintiff's Complaint arises  
6 pursuant to 15 U.S.C. §1331 and 28 U.S.C. §1367 grants this court  
7 supplemental jurisdiction over the state claims contained in Count I.  
8 4. Defendant conducts business in the State of California thereby establishing  
9 personal jurisdiction.  
10 5. Venue is proper pursuant to 28 U.S.C. §1391(b)(2).

11  
12 **PARTIES**

- 13 6. Plaintiff is a natural person residing in Alta Loma, California.  
14 7. Plaintiff is a consumer or debtor and allegedly owes a debt as that term is  
15 defined by Cal. Civ. Code §1788.2(d)-(e).  
16 8. Defendant is a business entity with a business office located in Charlotte,  
17 North Carolina and conducting business in California.  
18 9. Defendant is a debt collector as that term is defined by Cal. Civ. Code  
19 §1788.2(c), and sought to recover a consumer debt from Plaintiff.  
20 10. Defendant acted through its agents, employees, officers, members,  
21 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,  
22 representatives, and insurers.

23  
24 **FACTUAL ALLEGATIONS**

- 25 11. Plaintiff acquired a credit card ending in account number 8195 from  
26 Defendant which was used for personal, family, and household purposes.  
27 12. Defendant placed calls to telephone number 626.221.8307, which is  
28 Plaintiff's cellular telephone. See Exhibit "A" which is Plaintiff's call log.

- 1 13. Upon information and belief based on the frequency, number, nature, and  
2 character of these calls, Defendant placed each of its calls to Plaintiff using  
3 an automatic telephone dialing system or other equipment that has the  
4 capacity to store and/or produce telephone numbers.
- 5 14. The purpose of these calls was to collect funds from Plaintiff for purchases  
6 arising from the credit card account ending in 8195.
- 7 15. On or around October 12, 2016, Plaintiff spoke with one of Defendant's  
8 employees and instructed Defendant to stop calling her cell phone number  
9 and agreed to enter into a settlement agreement on account ending in 8195.  
10 See Exhibit "B" which is a copy of the settlement agreement.
- 11 16. Plaintiff made the first three payments as agreed pursuant to the settlement  
12 agreement. See Exhibit "C" which is a record of the payments.
- 13 17. In January of 2016, Defendant breached the settlement agreement by  
14 demanding additional monies from Plaintiff. Plaintiff refused to pay  
15 anything more than agreed as set forth in the settlement agreement of  
16 October 12, 2016.
- 17 18. Defendant continued to call Plaintiff's cell phone. See Exhibit "A" which is  
18 Plaintiff's call log.
- 19 19. Since June 30, 2016, Defendant has called Plaintiff's cell phone at least one  
20 hundred and fifty (150) times. See Exhibit "A" which is Plaintiff's call log.
- 21 20. During this time period Defendant called Plaintiff's cell phone as many as  
22 five (5) times in a single day. See Exhibit "A" which is Plaintiff's call log.
- 23 21. Plaintiff is annoyed and feels harassed by Defendant's calls.
- 24 22. Defendant placed these calls voluntarily.
- 25 23. Defendant placed these calls under its' own free will.
- 26 24. Defendant had knowledge that it was using an automatic telephone dialing  
27 system to place these calls.
- 28

1 25. Defendant intended to use an automatic telephone dialing system to place  
2 these calls.

3  
4 **COUNT I**

5 **DEFENDANT VIOLATED THE ROSENTHAL FAIR DEBT COLLECTION**  
6 **PRACTICES ACT**

7 26. Defendant violated the Rosenthal based on the following:

- 8 a. Defendant violated the §1788.11(d) of the Rosenthal by causing  
9 Plaintiff's telephone to ring repeatedly or continuously to annoy the  
10 person called.
- 11 b. Defendant violated §1788.11(e) of the RFDCPA by communicating, by  
12 telephone, with the debtor with such frequency as to be unreasonable and  
13 to constitute a harassment to the debtor under the circumstances.
- 14 c. Defendant violated the §1788.17 of the Rosenthal by continuously failing  
15 to comply with the statutory regulations contained within the FDCPA, 15  
16 U.S.C. §1692 et seq. to wit: Sections 1692d.

17  
18 WHEREFORE, Plaintiff, SUSAN NASSAR, respectfully requests judgment  
19 be entered against Defendant, BANK OF AMERICA for the following:

- 20  
21 27. Statutory damages of \$1000.00 pursuant to the Rosenthal Fair Debt  
22 Collection Practices Act, Cal. Civ. Code §1788.30(b), and  
23 28. Costs and reasonable attorneys' fees pursuant to the Rosenthal Fair Debt  
24 Collection Practices Act, Cal. Civ. Code §1788.30(c), and  
25 29. Any other relief that this Honorable Court deems appropriate.

26  
27 **COUNT II**

**DEFENDANT VIOLATED THE TELEPHONE CONSUMER  
PROTECTION ACT**

30. Defendant's actions alleged supra constitute numerous negligent violations of the TCPA, entitling Plaintiff to an award of \$500.00 in statutory damages for each and every violation pursuant to 47 U.S.C. §227(b)(3)(B).

31. Defendant's actions alleged supra constitute numerous and multiple knowing and/or willful violates of the TCPA, entitling Plaintiff to an award of \$1500.00 in statutory damages for each and every violation pursuant to 47 U.S.C. §227(b)(3)(B) and 47 U.S.C. §227(b)(3)(C).

WHEREFORE, Plaintiff, SUSAN NASSAR, respectfully requests judgment be entered against Defendant, BANK OF AMERICA, for the following:

32. Statutory damages of \$500.00 for each and every negligent violation of the TCPA pursuant to 47 U.S.C. §227(b)(3)(B);

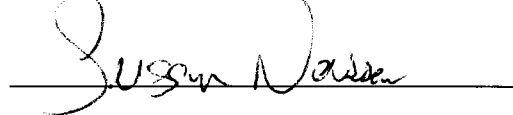
33. Statutory damages of \$1500.00 for each and every knowing and/or willful violation of TCPA pursuant to 47 U.S.C. §227(b)(3)(B) and 47 U.S.C. §227(b)(3)(C);

34. All court costs, witness fees and other fees incurred; and

35. Any other relief that this Honorable Court deems appropriate.

RESPECTFULLY SUBMITTED,

Dated: February 13, 2019



SUSAN NASSAR  
11090 SEVEN PINES DR  
ALTA LOMA CA 91737  
Tel No. 626.221.8307  
Email address: rnassarins@gmail.com  
Fax: 909.963.5100  
Plaintiff, In Pro Per



# EXHIBIT A

(b)



EXHIBIT A

richard nassar &lt;rnassarins@gmail.com&gt;

**Churchill Documents**

12 messages

miranda.king@churchillcreditsolutions.com &lt;miranda.king@churchillcreditsolutions.com&gt;

Wed, Jul 27, 2016 at 8:37 AM

Welcome to the program Susan. Please find the attached introduction documents: contact sheet, income form, hardship form, and call log. Please record any calls from creditors that you receive regarding the accounts and forward the log to our office so we know who to send cease and desist letters out to. We'll need income and hardship information down the road when we begin negotiations on the accounts. Please forward any questions/concerns to our office via email/mail.

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

**4 attachments**

- Call Log.docx**  
17K
- Consumer Advocacy Welcome Letter.docx**  
36K
- Hardship Request Form.docx**  
33K
- Income Questionnaire.pdf**  
118K

richard nassar <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Mon, Aug 1, 2016 at 10:49 AM

Hello Miranda

Here is a hardship info and Income list as well as some call logs of numbers that we are still getting calls from constantly. Please work on having these calls stopped.

Thank you

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
909-245-0822

[Quoted text hidden]

**churchill.pdf**  
2183K

richard nassar <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Tue, Aug 9, 2016 at 2:17 PM

Here are more call logs just from a week of August. I need to know a status on what you have done so far with our account. Please send me copies of any documents that have been sent out to the creditors so far. I would like a update on the status thus far.

Thank you

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
909-245-0822

On Wed, Jul 27, 2016 at 8:37 AM, <miranda.king@churchillcreditsolutions.com> wrote:

[Quoted text hidden]

 **call log august first week.pdf**  
916K

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <massarins@gmail.com>

Wed, Aug 10, 2016 at 7:38 AM

Hello Richard, attached are copies of the PoA and Cease and Desist letters that were distributed at the beginning of August to each of the banks (the C&D are each personalized with acct numbers). Generally, the banks process within 14 business days (some are much quicker and will have them on file within a week).

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

[Quoted text hidden]

**2 attachments** **Cease and Desist Form Letter.docx**  
53K **Nassar, Susan PoA updated.pdf**  
59K

Insurance <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Wed, Aug 10, 2016 at 8:03 AM

Awesome thank you

Sent from my iPhone

[Quoted text hidden]

&lt;Cease and Desist Form Letter.docx&gt;

&lt;Nassar, Susan PoA updated.pdf&gt;

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Tue, Aug 23, 2016 at 11:24 AM

Hello Miranda,

These calls are getting worst and have not slowed down one bit. I am now receiving calls from different numbers and they are getting more aggressive. I know Neil had asked me not to communicate with these guys, but would it be an issue if i directed them to you or Neil's or even a company phone number for Churchill since your company is representing me at this time. This way the call stop coming into me and you guy can deal with them directly. Here is another list of numbers. Please give me any new updates on my account.


Thank you

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
909-245-0822

[Quoted text hidden]

 **log for 2nd half aug.pdf**  
2476K

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <massarins@gmail.com>

Thu, Aug 25, 2016 at 11:30 AM

Richard, please feel free to direct them to our office, you can give them my phone number 646.202.2551. I am looking into seeing if there is some support that Veritas can provide to knock the calls out.



Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

EXHIBIT A

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: Re: Churchill Documents  
From: richard nassar <rnassarins@gmail.com>  
[Quoted text hidden]

Insurance <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Fri, Sep 9, 2016 at 2:04 PM

Can you please ask Niel what is going on with the calls that I am still getting. He was suppose to get back to me in regards to what has been done about the calls still coming in. This issue is still not resolved and I'm getting more calls then before

Sent from my iPhone  
[Quoted text hidden]

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: Insurance <rnassarins@gmail.com>

Mon, Sep 12, 2016 at 8:21 AM

Hi Richard, I know we issued cease and desist letters, but I'll make sure we check into them today and see why they haven't been processed / why you're still receiving calls.

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: Re: Churchill Documents  
[Quoted text hidden]

Insurance <rnassarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 9:02 AM

Good morning Miranda,

I need and update by the end of today please. I need to know exactly what is going on with my account. I was suppose to be in the loop every step of the way and all that I see happening is that my money is being drafted each month and these call are not stopping. I need to know where my money is going and what steps have been takes so far.

Also the only phone number I seem to have for the coming is yours and Niel. The number you gave me to give to creditors is your number and not you legal department. I would like your company's main phone number as well as your legal departments phone number. I would also like the company's info that is drafting my account each month because I noticed it's not Churchill that is taking the money.

Sincerely  
Richard Nassar

Sent from my iPhone  
[Quoted text hidden]

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: Insurance <rnassarins@gmail.com>

Thu, Sep 22, 2016 at 11:34 AM

Hello Richard,

Firstly, we do not generally reach out to clients unless we run into an issue or a settlement is reached, so if you'd like an update in between you'd just need to reach out to us.

Any calls regarding your account need to be coming to me since I am the arbitrator on your file.  
If you need an alternative number you can call 646 202 2549.

1/4/2019

Gmail: Churchill Documents

EXHIBIT A

Your money is ONLY going directly into an escrow account with Global (an escrow company). The money is literally sitting in that account until a settlement is reached, at which the funds are deployed to the bank from that account.

PoAs have been sent on each of your accounts; however it will be at least another couple months before your accounts are charged off (this is when the banks allow us to begin submitting settlement offers, depending on the bank this will range from 90-180 days after your final payment on the account was made).

I've forwarded your message to Victor Castaldo at Veritas, the attorneys, regarding the calls you have been receiving. Since we have already sent PoAs and Cease and desist letters, they will need to step in and take further action. Please let me know if you have any other questions or concerns and I can address it or have Neil reach out to you directly.

Best,

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: Re: Churchill Documents

From: Insurance <rmassarins@gmail.com>

[Quoted text hidden]

richard nassar <rmassarins@gmail.com>

To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 11:44 AM

Hello Miranda,

I appreciate the update on my account. I hope you understand my frustration with these calls hounding me every day. Especially when i was told they would stop and none of the call have. This alternative number you are giving me, is it your companies main number or the attorney's number? Should i transfer calls to your number or to the alternative number you provided me? Also i have had some account already go to collections, what do i do in that case?

Thanks  
Richard

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
Office: 909-276-7160  
Fax: 909-963-5100

[Quoted text hidden]

4  
(10)



richard nassar <rnassarins@gmail.com>

**[FWD: RE: Susan Nassar]**

4 messages

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <rnassarins@gmail.com>

Thu, Sep 22, 2016 at 12:21 PM

Richard, have you received calls on only the home number or cell/work numbers as well?

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: RE: Susan Nassar  
From: Victor Castaldo <victor@veritaslegalplan.com>  
Date: Thu, September 22, 2016 3:00 pm  
To: "miranda.king@churchillcreditsolutions.com"  
<miranda.king@churchillcreditsolutions.com>

Hi Miranda,  
Were they called on the home number?

Victor Castaldo  
Ph# 877-745-5006 ext 1004  
Fax# 888-774-4271  
Email: Victor@Veritaslegalplan.com

  
**Veritas Legal Plan**

From: miranda.king@churchillcreditsolutions.com [mailto:miranda.king@churchillcreditsolutions.com]  
Sent: Thursday, September 22, 2016 2:34 PM  
To: Victor Castaldo <victor@veritaslegalplan.com>  
Subject: Susan Nassar

Hi Victor. Our clients Susan and Richard Nassar have been being inundated with very aggressive collection calls from [mainly] Discover, Richard while he is at work. I've attached their call logs. We have sent PoAs and Cease and Desist letters, but the calls just keep continuing. They've asked them to stop calling repeatedly. Is there anything you guys could do to intervene?

Contact: Richard Nassar, 909-245-0822, rnassarins@gmail.com [ email is usually the easiest way to contact].

Thank you

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

EXHIBIT A

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 12:26 PM

most of the calls are coming to my cell and mostly my wife's cell daily multiple times a day and sometimes back to back from the same company. for instants Discover is now calling from this number 480-481-1846 and some are blocking their numbers now

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
Office: 909-276-7160  
Fax: 909-963-5100

[Quoted text hidden]

miranda.king@churchillcreditsolutions.com <miranda.king@churchillcreditsolutions.com>  
To: richard nassar <massarins@gmail.com>

Thu, Sep 22, 2016 at 12:49 PM

Richard please see the message below. Please contact veritas at 877 745 5006 ext 1014 to go over details of the calls you are receiving.

Miranda King  
Associate Debt Arbitrator  
Churchill Credit Solutions  
41 Madison Ave 31st Floor  
New York, NY 10010

Contact us for more information about receiving compensation for referrals!

----- Original Message -----

Subject: RE: Susan Nassar  
From: Victor Castaldo <victor@veritaslegalplan.com>  
Date: Thu, September 22, 2016 3:37 pm  
To: "miranda.king@churchillcreditsolutions.com"  
<miranda.king@churchillcreditsolutions.com>

No Problem.. Tell her to call Veritas again and enter ext 1014 that is Brittney. She will be able to help them. if she is not there tell Susan to leave a message and she will get back to her.

Victor Castaldo  
Ph# 877-745-5006 ext 1004  
Fax# 888-774-4271  
Email: [Victor@Veritaslegalplan.com](mailto:Victor@Veritaslegalplan.com)



From: miranda.king@churchillcreditsolutions.com [mailto:miranda.king@churchillcreditsolutions.com]  
Sent: Thursday, September 22, 2016 3:30 PM  
To: Victor Castaldo <victor@veritaslegalplan.com>  
Subject: RE: Susan Nassar

Thanks for getting back to me Victor. They are calling their cell phones.

[Quoted text hidden]

richard nassar <massarins@gmail.com>  
To: miranda.king@churchillcreditsolutions.com

Thu, Sep 22, 2016 at 12:59 PM

Awesome Thank you

(6)

(12)

1/4/2019

Gmail - (FWD) RE: Susan Nassar

Richard Nassar  
Lic.# 0D83052

**PRIME FIDELITY INSURANCE AGENCY**

"TRUSTED FIRST"  
350 S. Milliken Ave, Suite M  
Ontario Ca 91761  
Office: 909-276-7160  
Fax: 909-963-5100

EXHIBIT A

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7

13

# EXHIBIT A

## Churchill Credit Solutions Consumer Advocacy Call Log

[illegible]

(8)

(14)

EXHIBIT AChurchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/02/16	3:20 pm	B of A	800-451-6362
08/02/16	8:44 AM	Discover	623-643-2727
08/02/16	10:53 AM	B of A	800-451-6362
08/02/16	11:25 AM	Citi	423-477-2488
08/03/16	9:32 AM	B of A	800-451-6362
08/03/16	8:00 AM	Discover	<del>623</del> -643-2727
08/02/16	12:00 PM	CHASE	407-732-2414
08/03/16	12:32 PM	Discover	623-643-2727
08/02/16	12:00 PM	B of A	800-451-6362
08/01/16	10:32 AM	CHASE	847-426-9203
08/04/16	11:00 AM	B of A	800-451-6362
08/04/16	10:35 AM	Discover	623-643-2727
08/03/16	8:16 AM	Citi	800-388-2200
08/03/16	5:28 PM	Citi	423-477-2488
08/05/16	11:31 AM	Citi	423-477-2488
08/05/16	8:00 AM	Discover	623-643-2727
08/05/16	8:00 AM	Citi	800-388-2200
08/05/16	12:30 PM	Citi	800-388-2200
08/05/16	2:43 PM	B of A	800-451-6362
08/05/16	2:53 PM	Citi	423-477-2488
08/05/16	2:50 PM	CHASE	847-426-9203
08/09/16	12:35 PM	Discover	623-643-2727
08/09/16	8:18 AM	B of A	800-451-6362

(9)

(15)

EXHIBIT A

Churchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/09/16	12:35pm	Discover	623-643-2727
08/09/16	6:10pm	BofA	800-451-6362
08/10/16	12:37pm	Discover	623-643-2727
08/11/16	8:54am	BofA	800-451-6362
08/11/16	12:54pm	Discover	623-643-2727
08/12/16	8:32am	BofA	800-451-6362
08/12/16	12:27pm	Discover	623-643-2727
08/13/16	8:31am	BofA	800-451-6362
08/13/16	8:46am	Discover	623-643-2727
08/15/16	8:52am	Discover	623-643-2727
08/15/16	12:39pm	BofA	800-451-6362
08/16/16	9:15am	BofA	800-451-6362
08/16/16	12:25pm	Discover	623-643-2727
08/16/16	6:45pm	BofA	800-451-6362
08/17/16	8:10am	BofA	800-451-6362
08/18/16	9:51am	Discover	623-643-2727
08/19/16	8:48am	BofA	800-451-6362
08/19/16	9:28am	Discover	623-643-2727
08/22/16	8:23pm	BofA	800-451-6362
08/22/16	8:48am	BofA	800-451-6362
08/22/16	10:39am	BofA	800-451-6362
08/21/16	10:41am	Discover	623-643-2727
08/20/16	9:49am	Discover	623-643-2727

(10)

(16)



EXHIBIT AChurchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/17/16	10:41am	CITI	877-427-1985
08/17/16	2:13pm	CITI	877-437-1985
08/18/16	9:42am	Discover	623-643-2727
08/17/16	12:03pm	CITI	877-437-1985
08/17/16	2:43pm	CITI	877-437-1985
08/17/16	1:17pm	BofA	800-451-6362
08/17/16	3:37pm	CITI	877-437-1985
08/17/16	3:48pm	BofA	800-451-6362
08/18/16	9:18am	Discover	623-643-2727
08/18/16	10:31am	CITI	877-437-1985
08/18/16	11:19am	BofA	800-451-6362
08/18/16	2:03pm	CITI	877-437-1985
08/18/16	3:34pm	CHASE	847-426-9203
08/18/16	4:17pm	CITI	877-437-1985
08/18/16	5:37pm	BofA	800-451-6362
08/18/16	5:42pm	CITI	877-437-1985
08/18/16	6:48pm	Discover	623-643-2727
08/19/16	8:18am	Discover	623-643-2727
08/19/16	9:46am	CHASE	847-426-9203
08/19/16	10:20am	BofA	800-451-6362
08/19/16	3:24pm	CHASE	847-426-9203
08/19/16	4:40pm	BofA	800-451-6362
08/19/16	5:47pm	BofA	800-451-6362
08/20/16	8:37am	CITI	877-437-1985

EXHIBIT AChurchill Credit Solutions Consumer Advocacy  
Call Log

Date	Time	Creditor	Phone Number
08/20/16	8:38 AM	DISCOVER	623-643-2727
08/20/16	9:13 AM	CITI	800-388-2200
08/21/16	10:16 AM	CITI	800-388-2200
08/21/16	11:23 AM	CITI	877-437-1985
08/21/16	11:38 AM	CITI	800-388-2200
08/22/16	8:16 AM	DISCOVER	623-643-2727
08/22/16	8:19 AM	CITI	423-477-2488
08/22/16	8:30 AM	CITI	800-388-2200
08/23/16	9:05 AM	BoFA	800-451-6362
08/22/16	8:06 AM	CITI	423-477-2488
08/22/16	9:11 AM	BoFA	800-451-6362
08/22/16	9:15 AM	CITI	800-388-2200
08/22/16	9:38 AM	DISCOVER	623-643-2727
08/22/16	10:42 AM	DISCOVER	623-643-2727
08/22/16	11:10 AM	CITI	423-477-2488
08/23/16	8:05 AM	BoFA	800-451-6362
08/23/16	8:11 AM	DISCOVER	623-643-2727
08/23/16	8:29 AM	DISCOVER	623-643-2727
08/23/16	10:05 AM	BoFA	800-451-6362

(12)

(15)

# EXHIBIT B

EXHIBIT B



SUSAN NASSAR  
11090 SEVEN PINES DR  
ALTA LOMA CA 91737-7804

SETTLEMENT LETTER  
From Bank of America

October 12, 2016

Account number ending in: 8195

Susan Nassar:

This letter serves as written confirmation of your recent verbal agreement to settle your credit account.

**About the settlement offer**

As of the date of this letter your current balance is \$5,040.41. We've agreed to settle your account for \$3,074.00 through the terms listed below.

**What you need to do**

By accepting this offer, you agree to send the first installment payment of \$768.50 by October 31, 2016 and the remaining installments as listed below:

<u>Due date</u>	<u>Payment amount</u>	<u>Due date</u>	<u>Payment amount</u>
November 30, 2016	\$768.50	December 30, 2016	\$768.50
January 13, 2017	\$768.50		

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# EXHIBIT C

Global Client Solutions LLC  
4500 S 129th E AVE Suite 177  
Tulsa, OK 74134

EXHIBIT C

**Global Client Solutions LLC**  
Account #: 6036335098853414

RETURN SERVICE REQUESTED

April 13, 2017

Susan Nassar  
11090 Seven Pines Dr.  
Alta Loma, CA 91737

3 PAYMENT THAT  
WERE MADE OUTTIME  
TILL B of A BREACHED  
CONTRACT  
AGREEMENT

### ACCOUNT ACTIVITY STATEMENT (THIS IS NOT A BILL)

DATE	DESCRIPTION	TYPE	AMOUNT	BALANCE
07/28/2016	D1 - 07/25/16	Deposit	\$1,348.19	\$1,348.19
07/28/2016	Account Setup (one-time fee) - 07/22/16	Transaction Fee	-\$9.00	\$1,339.19
07/28/2016	Veritas - 07/25/16	Customer Fee	-\$500.00	\$839.19
08/01/2016	Monthly Service Charge - 07/16	Transaction Fee	-\$10.85	\$828.34
08/25/2016	Veritas - 08/25/16	Customer Fee	-\$55.00	\$773.34
08/29/2016	D1 - 08/25/16	Deposit	\$1,348.19	\$2,121.53
09/01/2016	Monthly Service Charge - 08/16	Transaction Fee	-\$10.85	\$2,110.68
09/26/2016	Veritas - 09/25/16	Customer Fee	-\$55.00	\$2,055.68
09/28/2016	D1 - 09/25/16	Deposit	\$1,348.19	\$3,403.87
10/03/2016	Monthly Service Charge - 09/16	Transaction Fee	-\$10.85	\$3,393.02
10/12/2016	Bank of America	Payment	-\$758.50	\$2,634.52
10/12/2016	Phone Pay COM	Transaction Fee	-\$5.00	\$2,629.52
10/12/2016	Settlement Fee - Bank of America	Payment	-\$1,008.01	\$1,621.51
10/25/2016	Veritas - 10/25/16	Customer Fee	-\$55.00	\$1,566.51
11/01/2016	Monthly Service Charge - 10/16	Transaction Fee	-\$10.85	\$1,555.66
11/01/2016	Bank of America	Payment	-\$10.00	\$1,545.66
11/14/2016	Bank of America	Payment	-\$758.50	\$787.16
11/14/2016	Phone Pay COM	Transaction Fee	-\$5.00	\$782.16
11/25/2016	Veritas - 11/25/16	Customer Fee	-\$55.00	\$727.16
12/01/2016	Monthly Service Charge - 11/16	Transaction Fee	-\$10.85	\$716.31
12/02/2016	Bank of America	Payment	-\$10.00	\$706.31
12/02/2016	Phone Pay COM	Transaction Fee	-\$5.00	\$701.31
12/12/2016	Phone Pay COM	Transaction Fee	-\$5.00	\$696.31
12/27/2016	Veritas - 12/25/16	Customer Fee	-\$55.00	\$641.31
01/03/2017	Monthly Service Charge - 12/16	Transaction Fee	-\$10.85	\$630.46
01/04/2017	PPay Advance - 01/04/17	Deposit	\$138.04	\$768.50
01/04/2017	Bank of America	Payment	-\$758.50	\$10.00
01/04/2017	Bank of America	Payment	-\$10.00	\$0.00

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